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LETTER AND RESPONSES TO COMMENTS FROM U S NAVY REGARDING DRAFT FINAL SAMPLING AND ANALYSIS PLAN SITES 3, 9, 10, 14, 29 AND 34 NAS PENSACOLA FL
4/18/1994
ENSAFE/ALLEN AND HOSHALL

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April 18, 1994

Commanding Officer, Southern Division
Naval Facilities Engineering Command
ATTN: Bill Hill, Code 1851
2155 Eagle Drive
Charleston, SC 29411-0068

RE: Responses to Southern Division Technical Review and Comments, Draft Final Sampling and Analysis Plans for Sites 3,9,10,14,29,34; Pensacola Naval Air Station, Pensacola, FL; Contract #N62467-89-D-0318, CTO-070.

Dear Mr. Hill:

EnSafe/Allen & Hoshall is pleased to submit responses to Southern Division's technical review comments for the draft Final Sampling and Analysis Plans for the Category 5 sites (Sites 3,9,10,14 and 34).

Should you have any questions or comments regarding these comment responses, please feel free to call me.

Sincerely,

EnSafe/Allen & Hoshall

Brian Caldwell

Brian E. Caldwell
Task Order Manager

Enclosure

cc: EnSafe/Allen & Hoshall file
EnSafe/Allen & Hoshall file - Pensacola

SOUTHERN DIVISION NAVAL FACILITIES ENGINEERING COMMAND
TECHNICAL REVIEW AND COMMENTS
DRAFT FINAL SAMPLING AND ANALYSIS PLANS FOR SITES 3, 9, 10, 14, 29, 34
NAVAL AIR STATION PENSACOLA, PENSACOLA, FLORIDA

Note: The first phase of fieldwork described in the reviewed SAPs was completed on 25 February, 1994. The Phase 1 technical memorandum for sites 9, 29, and 34 was submitted to the Tier 1 Team on 16 March, 1994, and the Phase 1 technical memorandums for sites 10, 14, and 3 are currently being prepared.

GENERAL COMMENTS

COMMENT:

1. What procedure will be used to establish risked based PRGs?

RESPONSE:

A list of risk-based concentrations (RBCs) for most parameters on the TAL/TCL has been developed by EPA Region III. This list was presented to the Pensacola Tier 1 team, and accepted for use in the Category 5 work.

The detected concentration of a given parameter will be compared to the RBC for that parameter; if the detected concentration exceeds the RBC, then the RBC becomes the PRG, for that parameter, at that site.

COMMENT:

2. What steps have been taken to eliminate organic contaminated water (EPA General Comment 1)?

RESPONSE:

This comment referred to the water used by E&E during their Phase I investigation. E/A&H has been and will continue to utilize analyte-free water that is produced through a filtration system that is housed in the onsite field operations trailer. To date, there have been no significant problems with this water source.

COMMENT:

3. Why do these plans call for installing permanent wells in areas without contamination? If you cannot get level IV data from the temporary wells, why are we doing level IV analysis in temporary wells?

RESPONSE:

Please see the response to specific comment 2. Level IV data will be collected from temporary wells for two reasons: first, level IV data will provide analysis for the full TAL/TCL, which will positively identify the full suite of contaminants that may be present, and will allow for development of a list of contaminants of concern; secondly, the quality assurance/quality control inherent in Level IV analyses legitimizes the actual presence of detected contaminants. Temporary wells are not chosen to enhance or to take away from the analyses; they are generally used to expedite the field effort.

COMMENT:

4. EPS's comments indicate a breakthrough in conducting these investigations. These plans have overlooked an opportunity to design an efficient Phase I, using Level II screening to eliminate sites that do not contain significant contamination.

   The responses to these comments have not achieved the level of competence that we need to lead this investigation to obtain a speedy and thorough study.

RESPONSE:

Level II screening could not be used to eliminate a site for further investigation. Level IV data is required for this purpose. Level II screening is utilized during a delineation phase of investigation; Level IV analyses will always be needed to confirm delineation. E/A&H agrees that the methodology proposed by EPA is tailored to increase the effectiveness and efficiency of site investigations; the methodology proposed in the SAPs for Category 5 is in-line with this methodology, as it was developed in conjunction with EPA during the 21 January 1994 meeting.

It would appear that either the draft SAP comment responses and redesigned draft final SAPs were not succinct enough in the description of the investigative processes to be employed, or the reviewer had an initial misunderstanding of the investigative approach. In the future, E/A&H will make every effort to logically present these types of issues, particularly when they are protocols agreed to by the Tier 1 team.

SPECIFIC COMMENTS

COMMENT

1. Site 3: The proposed changes in the SAP are not in line with the recommendations of the EPA (piezocone/hydrocone & level II analysis). Why not?

RESPONSE:

The EPA recommended the utilization of a method employing temporary sampling points: the SAP outlines a method employing temporary shallow wells (eg. piezocones). Furthermore, the approach presented in the SAP was not only agreed to by EPA, but was actually forwarded by them during the Tier 1 meeting in Pensacola, 21 January, 1994.

COMMENT:

2. Site 9, para 4.3: If contaminants are not found during initial sampling, why will permanent wells be installed and sampled? Are we going to sample forever?

RESPONSE:

Generally, the Baseline Risk Assessments must be completed using data collected from permanent monitoring wells. Additionally, long-term monitoring, which is more often than not a requirement for site remediation, would require the use of permanent well data. In the case of Category 5 sites exhibiting minimal to no contamination, the need for permanent wells will be made on a site-specific basis by the Tier 1 Team (eg. it may be that the temporary well data is acceptable for use in the BRA, and if no remedial action is planned at the site, based on the BRA, there may be no need for permanent wells).

COMMENT:

3. Site 9, para 4.4.3: What method will be used to screen below waste and fill if detected? (EPA comment 2)

RESPONSE:

Sampling locations more central to the fill area were agreed to by the Tier 1 Team on 21 January, 1994. Although no waste intervals were encountered, the temporary wells described in the SAP would have been screened below such an interval.

COMMENT:

4. Site 9, Fig 4-1: Why are sampling points 1,2,3 outside site boundary? Why not locate them centrally to comply with EPA comment 2?

RESPONSE:

These locations were actually suggested by the EPA technical representative during the 21 January meeting. These points were selected primarily to provide downgradient data from Site 9, which is purportedly quite old. In essence, the idea was that contaminants would most likely have been leached from the soil horizons long ago, and contamination would be represented by residual levels in the groundwater.

COMMENT:

5. Site 10, Fig 2-1: The drums west of site 9 mentioned in narrative are not on figure.

RESPONSE:

The areal extent and exact location of these drums is not presently known; a geophysical survey to determine this will be performed on 24 March, 1994. A general location could be provided on the map, however, it is believed that the drums are not associated with the historical activities at Site 10 and will be addressed as a separate issue.

COMMENT:

6. Site 10, para 4.4.2: This site appears to be ideal for piezocone/hydrocone sampling & level II analysis.

RESPONSE:

In the best professional judgement of the members of the Tier 1 Team, it was felt that there would not be levels of contamination at Site 10 that posed a significant risk to human health. Consequently, in an effort to eliminate the financial and temporal burdens of a phased investigation, the SAP proposed the installation of permanent wells in the locations agreed to by the Tier 1 Team on 21 January, 1994. If significant contamination requiring delineation is detected, then Level II analyses will be conducted for delineation purposes.

COMMENT:

7. Site 14, para 3.0: Why will a well inventory and a habitat and biota survey be performed when Section 2.1 states that there are no permanent wells and the habitat and biota survey has been performed by E&E?

RESPONSE:

As there are, and have been, numerous environmental investigations under various programs conducted at NAS Pensacola, there is always a possibility that there may be permanent wells onsite (or near the site) whose existence is unknown until completion of the contaminant source survey. This has been the case on several IR sites to date. Given that these wells can often provide valuable sampling points, a well inventory is justified during the investigation of each and every IR site.

The habitat and biota survey conducted by E&E, while providing good information, is sufficient only for a preliminary characterization. Additional evaluation is required on each site in order to accurately assess the potential ecological impacts of site contamination.

COMMENT:

8. Site 14, para 4.4.1: This does not address EPA Comment 2. What procedure will be used if the spoll area is too soft to allow a drill rig?

RESPONSE:

The response to EPA comment 2 for Site 14 appears to be fully addressed: the sampling of the interface between fill material and native soil was sampled and logged as such, and two Pensacola Bay sediment samples were collected directly at the locations of the catch basin outfalls. Additionally, the sampling scheme was revised (to a phased approach) to provide for the delineation of groundwater contamination.

A cathead/tripod rig was utilized to collect subsurface samples under the soft fill material.

COMMENT:

9. Site 28, para 4.3: See comment for Site 9 para 4.3.

RESPONSE:

Please see the response to Comment 2.

COMMENT:

10. Site 34, para 2.2: What size are the tanks in question? 45,000 gal seems excessive even with a total failure of the system.

RESPONSE:

The tanks are above ground, and each tank holds approximately 20,000 gallons. It was a solvent detergent solution which leaked. The apparent discrepancy can be accounted for in two ways: according to Frank Stuart, a NADEP engineer, the 45,000 gallons was a "best guess estimate"; and the solvent detergent solution was formulated by mixing the components of two of the tanks.

COMMENT:

11. Site 34, para 4.3: See comment for Site para 4.3.

RESPONSE:

Please see the response to Comment 2.